

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

JAVIER RAIGOZA,	)	
	)	2:04-cv-1208-GEB-KJM
Plaintiff,	)	
	)	
v.	)	<u>FINAL PRETRIAL ORDER</u>
	)	
ARAMARK CORPORATION;	)	
ARAMARK UNIFORM AND CAREER	)	
APPAREL, INC.; ARAMARK	)	
UNIFORM AND CAREER APPAREL	)	
GROUP, INC.; and BILL	)	
VERVALIN,	)	
	)	
Defendants.*	)	
_____	)	

The final pretrial conference scheduled for February 13, 2006, is vacated because of the issuance of this Order. The hearing on the Order to Show Cause is rescheduled for commencement at 3:30 p.m. on March 20, 2006.

I. JURY/NON-JURY

All issues shall be tried to a jury.

II. FACTUAL AND/OR LEGAL CONTENTIONS

A. The Final Pretrial Order supersedes the pleadings and controls the facts and claims which may be presented at trial.

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\* The caption has been changed to reflect the Order filed December 21, 2005.

Any legal theory of relief or affirmative defense asserted in the pleadings but not preserved for trial in this section of the Final Pretrial Order cannot be raised during the trial. Therefore, to preserve an issue for trial, and to be entitled to jury instructions on that issue, the issue shall be identified and preserved in this section of the Order. Failure to do so dismisses, waives or abandons that issue, claim or defense. Hotel Emp., et al. Health Tr. v. Elks Lodge 1450, 827 F.2d 1324, 1329 (9th Cir. 1987) ("Issues not preserved in the pretrial order are eliminated from the action.").

B. The following issues are preserved for trial provided jury instructions are submitted as required by section "IX" of this Order:

Plaintiff's claims

(1) That Defendant Vervalin violated 42 U.S.C. section 1981 by taking a portion of Plaintiff's bonus in August of 2002.

(2) That Defendants Aramark Uniform and Career Apparel, Inc.; Aramark Uniform Services; Aramark; Aramark Corporation; and Aramark Uniform and Career Apparel, Inc. are liable for Defendant Vervalin's violation of 42 U.S.C. section 1981 on the basis of vicarious liability and/or respondeat superior.

Affirmative defenses

The defenses asserted in the parties' Joint Pretrial Statement have not been preserved either because they did not constitute affirmative defenses, Zivkovic v. Southern Cal. Edison Co., 302 F.3d 1080, 1088 (9th Cir. 2002), or because they were not presented in a filed motion before the law and motion deadline

1 passed, see U.S. v. Hartford Fire Ins. Co., 112 F. Supp. 2d 1023,  
2 1028-29 (D. Haw. 2000).

3 C. In addition to the matters set forth in Local Rule  
4 16-285, the parties shall brief the following point of law in their  
5 trial briefs.

6 (1) The elements, standards, and burdens of proof as  
7 to Plaintiff's cause of action, including citations of authority in  
8 support thereof.

9 Notwithstanding Local Rule 16-285, trial briefs shall be  
10 filed with the Court no later than twenty (20) court days prior to  
11 the date of trial. A joint or partial joint trial brief is  
12 permitted. All legal positions briefed in the trial brief shall be  
13 supported with case and applicable statutory authority. See Local  
14 Rule 16-285. If separate or partial separate trial briefs are  
15 submitted, responding briefs, if any, shall be filed with the Court  
16 no later than five (5) court days prior to trial. **The trial**  
17 **brief(s) must include "a summary of points of law, including**  
18 **reasonably anticipated disputes concerning admissibility of**  
19 **evidence, legal arguments, and citations of authority in support**  
20 **thereof."** Local Rule 16-285(a) (3).

21 III. WITNESSES

22 A. Plaintiff expects to call as witnesses, either in  
23 person or by deposition, some or all of the persons listed in  
24 Exhibit A, attached hereto.

25 B. Defendant expects to call as witnesses, either in  
26 person or by deposition, some or all of the persons listed in  
27 Exhibit B, attached hereto.  
28

1 C. Each party may call a witness designated by the  
2 other.

3 D. No person, other than those named on these witness  
4 lists, will be permitted to testify unless:

5 (1) The party offering the witness demonstrates that  
6 the witness is for the purpose of rebutting evidence which could  
7 not reasonably be anticipated at the pretrial conference; or

8 (2) The witness was discovered after the pretrial  
9 conference and the proffering party makes the showing required in  
10 "E", below.

11 E. If a witness is discovered after the pretrial  
12 conference, counsel for the party offering the witness shall  
13 promptly inform the Court and opposing parties of the existence of  
14 the unlisted witness so that the Court may consider at trial  
15 whether the witness shall be permitted to testify. The witness  
16 will be not be permitted to testify unless:

17 (1) The witness could not reasonably have been  
18 discovered prior to pretrial;

19 (2) The Court and opposing counsel were promptly  
20 notified upon discovery of the witness;

21 (3) If time permitted, counsel offered the witness  
22 for deposition; and

23 (4) If time did not permit, a reasonable summary of  
24 the witness' testimony was provided to opposing counsel.

25 IV. EXHIBITS

26 A. Plaintiff intends to offer in evidence the exhibits  
27 described in Exhibit C, attached hereto.

1 B. Defendant intends to offer in evidence the exhibits  
2 described in Exhibit D, attached hereto.

3 C. No other exhibits will be permitted to be introduced  
4 unless:

5 (1) The party seeking to use the unlisted exhibit  
6 demonstrates that the exhibit is being used to rebut evidence which  
7 could not reasonably have been anticipated at the pretrial  
8 conference; or

9 (2) The unlisted exhibit was discovered after the  
10 pretrial conference and the offering party makes the showing  
11 required in paragraph "D", below.

12 D. Any party proposing to introduce an exhibit which was  
13 discovered after the pretrial conference shall promptly notify the  
14 Court and opposing counsel of the existence of such exhibit. The  
15 Court will not permit any such exhibit to be introduced unless it  
16 finds:

17 (1) That the exhibit could not reasonably have been  
18 discovered prior to the pretrial conference;

19 (2) The Court and counsel were promptly informed of  
20 the exhibit's existence; and

21 (3) That the offering party has delivered a copy of  
22 the exhibit to opposing counsel, or, if the exhibit may not be  
23 copied, that the offering counsel has made the exhibit reasonably  
24 available for inspection by opposing counsel.

25 E. Plaintiff's exhibits shall be numbered and marked  
26 with colored stickers provided by the Court while Defendant's  
27 exhibits shall be designated by alphabetical letter also marked  
28

1 with colored stickers provided by the Court. To obtain stickers,  
2 parties should contact the Clerk of Court at (916) 930-4000.

3 The parties are directed to exchange with each other, at  
4 least twenty (20) court days prior to trial, copies of all of their  
5 respective exhibits, marked with exhibit stickers provided by the  
6 Court. Within five (5) court days after receipt and examination of  
7 the exhibits, each party shall file with the Court and serve upon  
8 opposing counsel objections, if any, to the exhibits, referencing  
9 the exhibits as marked by exhibit sticker and specifying the basis  
10 for each objection.<sup>1</sup> Failure to exchange exhibits as ordered could  
11 result in the exhibit not being used at trial and/or the imposition  
12 of sanctions. The failure to make objections in the manner  
13 prescribed by this section shall constitute a waiver of objections.  
14 A party seeking to admit into evidence an exhibit to which no  
15 objection was made must identify said exhibit for the record and  
16 then move it into evidence.

17 Counsel shall produce all exhibits to the Clerk's Office  
18 on the Friday before the before trial date, no later than 4:00 p.m.  
19 At that time, the parties shall also furnish the Court with a copy  
20 of each exhibit, unless the exhibit is physically incapable of  
21 being reproduced. Failure to produce exhibits as ordered could  
22 result in waiver of the right to offer those exhibits. Each party  
23 submitting exhibits shall furnish a list to the Court, the  
24 courtroom deputy and opposing counsel itemizing the exhibits.

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26  
27  
28 <sup>1</sup> The parties have leave to file joint exhibits. The above  
procedure is designed for separate exhibits.

1 V. FURTHER PREPARATION FOR USE OF DISCOVERY DOCUMENTS<sup>2</sup>

2 A. It is the duty of counsel to ensure that any  
3 depositions which are to be used at trial for any purpose shall  
4 have been filed with the clerk, and counsel are cautioned that a  
5 failure to discharge this duty may result in preclusion of the use  
6 of the unfiled depositions or in the imposition of such other  
7 sanctions as the Court deems appropriate.

8 B. No later than twenty (20) court days before the trial  
9 commencement date, counsel for each party shall serve on the other  
10 parties a statement designating all answers to interrogatories and  
11 all portions of depositions (except for passages to be used solely  
12 for refreshing recollection, impeachment or rebuttal). No later  
13 than ten (10) court days before the trial commencement date,  
14 counter-designations of other portions of these discovery documents  
15 may be served. No later than five (5) court days before trial, the  
16 parties shall file and serve any preserved evidentiary objections  
17 to any designated discovery, or said objections are waived.

18 VI. AGREED STATEMENT

19 The parties shall submit a short, jointly-prepared  
20 statement concerning the nature of this case that can be read to  
21 the jury at the commencement of trial. The statement shall be  
22 provided to the Court no later than ten (10) court days before the  
23 commencement of trial. If the parties fail to do this, they may be  
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25 <sup>2</sup> Counsel for the parties are required to meet and confer  
26 on whether it is appropriate to submit any documents to the judge  
27 prior to trial. If the parties decide this is appropriate, they  
28 shall reflect their agreement in a stipulation which has attached  
thereto whatever documents they agree can be considered by the  
judge before trial. The stipulation should be filed and submitted  
to the judge's chambers at the parties' earliest convenience.

1 required to give their respective opening statements before voir  
2 dire. Separate statements shall be submitted if agreement is not  
3 reached.

4 VII. SEPARATE TRIAL OF ISSUES

5 The trial will be conducted in two phases: liability and  
6 punitive damages. If the jury finds punitive damages are  
7 recoverable in the liability phase, trial on the amount of punitive  
8 damages will immediately occur. During the first phase of the  
9 trial, the jury will be given a liability instruction on punitive  
10 damages along with the other closing instructions and a verdict  
11 form which will include the question whether punitive damages  
12 should be awarded. If the answer is yes, the second phase of the  
13 trial would then occur with the presentation of financial condition  
14 evidence pertinent to the amount of punitive damages, following  
15 which the parties would present closing argument on that issue and  
16 a second phase jury instruction would be given to the jury on the  
17 issue. The jury would then deliberate on the issue and fill in a  
18 punitive damages verdict form.

19 VIII. JURY INSTRUCTIONS, VOIR DIRE, AND VERDICT FORMS

20 A. The parties are to prepare jury instructions, in the  
21 manner specified in paragraph B below. Counsel shall tailor all  
22 general instructions to the facts and issues in suit.

23 B. Counsel are directed to confer and to attempt to  
24 agree upon a joint set of jury instructions. All instructions,  
25 both general and specific, shall be submitted in the exact  
26 numerical order counsel desires them given to the jury and shall be  
27 tailored to the facts and issues in suit.  
28



1           The joint set of instructions shall be filed with the  
2 court clerk fifteen (15) court days prior to the date of the trial  
3 and shall be identified as the "Jury Instructions Without  
4 Objection." See L.R. 51-163(b). As to instructions on which there  
5 is dispute, the parties shall adhere to the following procedure:  
6 1) the party offering the disputed instruction(s) shall submit the  
7 instruction(s) as its package of proposed jury instructions, shall  
8 submit a brief memorandum in support of the proposed instruction(s)  
9 and shall number the disputed instruction in a manner that shows  
10 where each disputed instruction should be placed in the tendered  
11 agreed upon instructions. The contested instruction(s) and  
12 memorandum in support shall be filed with the joint set of  
13 instructions fifteen (15) court days prior to the date of the  
14 trial; 2) the party opposed to the contested instruction(s) shall  
15 submit a brief memorandum succinctly stating the legal basis of the  
16 objection(s); 3) the memoranda in opposition to the contested  
17 instruction(s) shall be filed ten (10) court days prior to the date  
18 of the trial.

19           C. All instructions shall be, to the extent possible,  
20 concise, understandable, and neutral statements of law. They shall  
21 be prepared in accordance with Local Rule 51-163. Ninth Circuit  
22 Pattern Instructions are preferred.

23           D. It is the parties' responsibility to ensure that  
24 jury instructions are submitted on all issues preserved for trial  
25 in accordance with the schedule set forth above. Pursuant to Local  
26 Rule 51-163, instructions not presented in accordance with this  
27 Order will be refused unless it is shown either (1) that the  
28 necessity for the request arose in the course of trial; the

1 instructions could not reasonably have been anticipated prior to  
2 trial from the Final Pretrial Order; and the request for such  
3 additional instructions is presented to the Court as promptly as  
4 possible; or (2) that the refusal to give such instructions would  
5 constitute manifest injustice under Rule 16(e).

6 Likewise, any objections to proposed instructions not  
7 made in accordance with this Order will be overruled as untimely  
8 unless it is shown either (1) that the grounds therefor arose in  
9 the course of trial and the intention to make such objections is  
10 communicated to the Court as promptly as possible, or (2) that the  
11 giving of such instructions would constitute plain error.

12 E. Most of the examination of prospective jurors is  
13 conducted by the Court. The parties are directed to meet and  
14 confer and attempt to agree upon a joint set of proposed voir dire  
15 questions. These questions shall include any voir dire questions  
16 supplied by the Court that the parties believe are necessary. The  
17 joint set of voir dire questions shall be filed with the Court  
18 fifteen (15) court days prior to the date of the trial. Parties  
19 may also submit proposed voir dire questions which are disputed.  
20 Disputed voir dire questions shall be filed with the Court fifteen  
21 (15) court days prior to the date of the trial and shall be  
22 accompanied by an explanation as to the need for the question and  
23 supporting case authority when available. The opposing party shall  
24 respond with reasons for the opposition and any supporting case  
25 authority no later than ten (10) court days prior to the date of  
26 trial. Each side is granted ten (10) minutes to conduct voir dire  
27 following the Court's examination of prospective jurors.

1 F. The parties shall file a joint verdict form  
2 concurrently with proposed jury instructions fifteen (15) court  
3 days prior to the commencement of trial. See L.R. 51-163(e). A  
4 special verdict or interrogatories shall be included for all  
5 factual disputes submitted to the jury that must be resolved before  
6 questions of law can be decided, and for any other issue on which  
7 specific responses are desired. The verdict form shall be prepared  
8 in accordance with Local Rule 51-163(e). At the same time, where  
9 disagreements exist, the parties shall explain the disagreement and  
10 submit points and authorities supporting their respective  
11 positions.

12 At the time of electronically filing the jury  
13 instructions and verdict form, counsel shall also submit a copy of  
14 the sanitized joint jury instructions, the sanitized disputed jury  
15 instructions, and the joint verdict form to the Court by email to  
16 geborders@caed.uscourts.gov in accordance with L.R. 51-163(b)(1).

17 G. The failure of one or more of the parties to  
18 participate in the preparation of joint jury instructions, proposed  
19 voir dire questions, or verdict form does not excuse the other  
20 parties from their obligation to timely file these documents with  
21 the Court in accordance with this Order. In the event that a party  
22 fails to participate as ordered, the party timely submitting these  
23 documents shall include a declaration explaining why it was unable  
24 to obtain the cooperation of the other party or parties.

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IX. USE OF STRUCK JURY SELECTION SYSTEM

Eight jurors will be impaneled. The "struck jury" system will be used to select the jury.<sup>3</sup> At the beginning of the voir dire process, eighteen prospective jurors, randomly selected by the Jury Administrator, will be seated for voir dire.<sup>4</sup> The order of the jurors' random selection is reflected by the order in which they will be seated. The first randomly selected juror will be in jury seat number one, which is at the extreme right-hand side of the jury box in the top row as the jury box is viewed from the well of the courtroom. The eighth juror will be in the eighth seat. The ninth selected juror will occupy the seat located at the extreme right-hand side of the jury box in the bottom row. The fifteenth seat will be in the left-hand side of that row. Three chairs will be placed in front of the jury box. The sixteenth juror will occupy the seat on the right and the eighteenth juror will occupy the seat on the left. The first eight jurors on a list, which shall be given to counsel, will constitute the petit jury unless one or more of those jurors is excused for some reason. Assuming that the first and fifth jurors on the list are excused, the second listed juror becomes the first, and the other jurors' numbers are changed accordingly, with the ninth juror on the list

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<sup>3</sup> As explained in United States v. Blouin, 666 F.2d 796, 798 (2d Cir. 1981), "the goal of the 'struck jury' system is to whittle down an initially selected group . . . [to the amount of jurors] who will serve as the petit jury." The selected group consists of the jurors who will hear the case, plus the number of jurors required to enable the parties to use the combined number of peremptory challenges allotted to both sides for striking jurors from the group. Typically extra jurors are included in the select group in the event the minimum amount of jurors required for the "struck system" is reduced "for cause" or some other reason.

<sup>4</sup> More could be seated.

becoming seventh on the list; however, the jurors continue to be identified by their original numbers.

Following the voir dire questioning, each side will exercise its three allowed peremptory strikes.<sup>5</sup> A copy of the "strike sheet" which will be used is attached to this Order. Generally, the potential jurors are given a break for the amount of time the parties estimate it will take them to exercise peremptory strikes. Therefore, before the striking process begins, the parties are requested to provide an estimate of how long it will take to exercise their peremptory strikes so the potential jurors can be allowed to take a break for that amount of time. Peremptory strikes will be exercised silently, by passing the strike sheet between the parties, with the Plaintiff going first. To use a strike, write the seat number of the juror above the line where the strike is required to be designated.<sup>6</sup> A party who does not use a strike waives any further right to exercise that strike and is required to reflect this waiver by writing the word "pass" on the strike sheet where the strike was supposed to have been exercised.

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<sup>5</sup> During the questioning, the attached Query Re Excuse Potential Jurors form could be given to the parties to determine if a particular juror should be excused. The attached for cause form will also be used.

<sup>6</sup> For example, assuming Plaintiff elects to strike the juror in seat number 6, that strike will be exercised and then the strike sheet is given to defense counsel. Assuming defense counsel then strikes the juror in seat 4, the first line of the strike sheet will appear as follows:

Plaintiff 1 **6** Defendant 1 **4**

Defense counsel would then give the strike sheet back to Plaintiff so he could exercise his second strike.

1 X. ATTORNEYS FEES

2 The parties are referred to Local Rule 54-293 concerning  
3 the post-trial procedure for seeking an award of attorney's fees.

4 XI. JURY INSTRUCTION AND VERDICT FORM CONFERENCE

5 A jury instruction and verdict form conference will be  
6 scheduled if necessary. See Local Rule 51-163(f). The attorney  
7 who will try the case for each party shall attend the conference.  
8 The purpose of the conferences is to finalize these matters, to the  
9 extent possible, before trial. The possibility of conferences  
10 being scheduled does not relieve the parties from their obligation  
11 to comply with all provisions of this Order.

12 XI. TRIAL DATE

13 Trial to a jury is set for March 28, 2006.<sup>7</sup> A trial day  
14 will commence at 9:00 a.m. and will adjourn at approximately 4:30  
15 p.m. At the first phase of the trial, each side has ten (10)  
16 minutes within which to make an opening statement to the jury and  
17 forty-five (45) minutes within which to make a closing argument.  
18 If trial proceeds to the second phase, each side has ten (10)  
19 minutes within which to make a closing argument on the punitive  
20 damage issue. Counsel are to call Shani Furstenau, Courtroom  
21 Deputy, at (916) 930-4114, one week prior to trial to ascertain the  
22 status of the trial date.

23 XII. COMMUNICATION WITH JURY

24 The Court intends to communicate the following to the  
25 jury just before it retires to deliberate:

26 \_\_\_\_\_  
27 <sup>7</sup> **The parties are required to meet and confer about the**  
28 **length of the trial and to file a document no later than twenty**  
**(20) court days before trial in which the length of trial is**  
**estimated.**

1. Is the United States Marshal's representative present who will take charge of the jury?
2. Deputy Clerk, please give the oath to the United States Marshal's representative.
3. The jury may take breaks at will, **without advance permission**, under the general supervision of the United States Marshal's representative.
4. The jury may go to lunch when they desire, **without advance permission**, under the general supervision of the United States Marshal's representative. When the jury leaves for lunch, **the United States Marshal's representative shall tell my courtroom deputy clerk** so that I, my staff, the lawyers, and the parties can be relieved from standby status. This allows those on standby status to go to lunch at the same time the jury has lunch.
5. The jury is authorized to adjourn for the evening **without advance permission**, and without having to return to this courtroom to be excused by me in front of the parties, but **the United States Marshal's representative shall tell my deputy courtroom clerk** when the jury adjourns so that the judge, the judge's staff, the lawyers, and the parties can be relieved from standby status.
6. When deliberations are continued the day after evening adjournment, jurors are permitted to proceed directly to the jury deliberation room. But jurors

1 are to wait until all jurors are present before  
2 resuming deliberations.

3 7. We desire you to deliberate between the hours of  
4 9:00 a.m. and 4:30 p.m., as necessary. However, you  
5 may deliberate for a shorter or longer period if you  
6 desire, provided all of you are in agreement.  
7 Otherwise, you should let me know about the  
8 disagreement.

9 8. If you have a cell phone and/or a device with a  
10 wireless internet connection, you must give it to  
11 the United States Marshal's representative before  
12 you go into the jury deliberation room so that we  
13 can be assured that there is no interference with  
14 your deliberations. That representative will return  
15 it when you leave the jury deliberation room.

16 9. The United States Marshal's representative will  
17 maintain a post outside the jury deliberation room  
18 to protect the jury from outside influences or  
19 visitors. That representative shall not communicate  
20 with you about the case or the court system because  
21 such conversations could be misconstrued as a  
22 communication that seeks to influence the jury.  
23 Stay in the jury room until all jurors are ready to  
24 leave for a break or lunch.

25 10. Please escort all jurors to the deliberation room.

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27 ///

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1           FAILURE TO COMPLY WITH ALL PROVISIONS OF THIS ORDER MAY  
2 BE GROUNDS FOR THE IMPOSITION OF SANCTIONS ON ANY AND ALL COUNSEL  
3 AS WELL AS ANY PARTY OR PARTIES WHO CAUSE NON-COMPLIANCE WITH THIS  
4 ORDER.

5  
6           IT IS SO ORDERED.

7 Dated: February 10, 2006

8                               /s/ Garland E. Burrell, Jr.  
9                               GARLAND E. BURRELL, JR.  
10                              United States District Judge  
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Plaintiff      1\_\_\_\_\_

                  2\_\_\_\_\_

                  3\_\_\_\_\_

Defendants    1\_\_\_\_\_

                  2\_\_\_\_\_

                  3\_\_\_\_\_

Query re Excuse Potential Juror

Do you Agree that Juror No. \_\_\_\_\_ should be excused for the reason stated by the juror or for any other reason? (Check applicable box below)

Plaintiff's Attorney

Defendants'  
Attorney

RESPONSE:

☐☐

Yes

No

☐☐

Yes

No

Whether Jurors Present During Exercise of Peremptory Challenges

Can the jury be excused for the amount of time it will take to exercise peremptory challenges? (Set forth response in box below)

	Plaintiff's Attorney		Defendants' Attorney	
RESPONSE:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	Yes	No

How long do you estimate it will take you to exercise peremptory challenges? (Set forth minutes in box below)

	Plaintiff's Attorney	Defendants' Attorney
MINUTES:	<input type="text"/>	<input type="text"/>

FOR CAUSE DOCUMENT  
Plaintiff's Counsel

If you have challenges for cause, state the seat number of the juror involved and a brief explanation of the reason for the challenge.

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

List seat numbers of other for cause challenges: \_\_\_\_\_, \_\_\_\_\_,

\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.

**CHECK THIS BOX IF YOU HAVE NO CHALLENGES FOR CAUSE:**

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Signed: \_\_\_\_\_

FOR CAUSE DOCUMENT  
Defendants' Counsel

If you have challenges for cause, state the seat number of the juror involved and a brief explanation of the reason for the challenge.

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Seat \_\_\_\_\_

Explanation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

List seat numbers of other for cause challenges: \_\_\_\_\_, \_\_\_\_\_,

\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.

**CHECK THIS BOX IF YOU HAVE NO CHALLENGES FOR CAUSE:**

☐

Signed: \_\_\_\_\_